

### Remarks

Applicant notes that the Examiner has allowed claims 52-57. As such, further discussion regarding these claims is considered moot. In addition, the Examiner objected to claim 35 due to a minor typographical error. In response, Applicant has amended claim 35 to correct the error, and requests the Examiner withdraw the objection.

The Examiner rejected claim 12 under 35 U.S.C. §102(e) as being anticipated by Chang. In supporting the rejection, the Examiner equates the gateway router (GR 32) of Chang to the access control server (ACS) of claim 12. Applicant respectfully disagrees. The claimed ACS is not a router, but a network entity that manages packet data communications. It includes a signaling interface that allows the ACS to facilitate such services as access, authentication, and call set-up, for example. The ACS relieves the MSC from having to handle these responsibilities, and leaves the MSC free to facilitate only circuit-switched communications within the network. To clarify this, Applicant has amended claim 12 to recite, "said access control server [includes] a signaling interface to manage packetized communications within said telecommunication network independent of said MSC, such that said MSC facilitates only circuit-switched communications within said telecommunication network."

The gateway router of Chang, in stark contrast, is nothing more than a router. It simply accepts packets from a source and forwards them to a destination. The disclosed gateway router does not include a signaling interface to manage packetized communications, and in fact, does nothing to manage packetized communications at all. Moreover, Chang never asserts that it does. *E.g.*, Chang, col. 8, ll. 5-8. Indeed, the gateway router of Chang and the claimed ACS are incongruent entities that perform fundamentally different functions within the network. As such, the router of Chang cannot be used to support a §102 rejection. Accordingly, Applicant respectfully requests the allowance of claim 12 and its dependent claims 14-26.

The Examiner also rejected claims 13, 27, 31, and 58 under 35 U.S.C. §102(e) as being anticipated by Chang, citing reasons similar to those for support. However, each of these

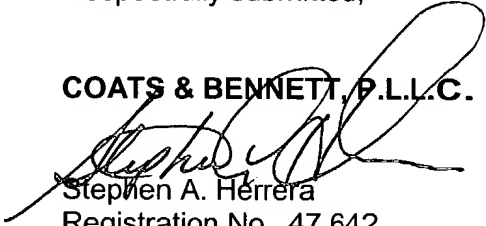
claims has been amended to include language similar to that of claim 12. Additionally, claims 27 and 31 already recite that the ACS *manages* packet data services for mobile devices. For the reasons stated above, Chang fails to anticipate any of claims 13, 27, 31, and 58 under §102. Applicant respectfully requests the allowance of claims 13, 27-36, and 58-60.

Finally, the Examiner rejected claim 37 under 35 U.S.C. §103(a) as being unpatentable over Chang. Claim 37 has been amended to include language similar to that of claim 12. Because Chang fails to teach or suggest an access control server having a signaling interface to manage packetized communications in the network, the §103 rejection necessarily fails as a matter of law. Therefore, Applicant respectfully requests the allowance of claim 37 and its dependent claims 38-51.

Respectfully submitted,

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